

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS

Hal Ruddick, Timothy Thomas, Felicia )  
Bryant, Barry Carr, Moshe Davis, and )  
Marshall Fuller, as Trustees of The Service )  
Employees International Union Local 4 )  
Health & Welfare Fund )

and )

08 cv 2496

Hal Ruddick, Timothy Thomas, Floyd )  
Schlossberg and Marshall Fuller, as )  
Trustees of The Service )  
Employees International Union Local 4 )  
Pension Fund )

Judge Zagel

Magistrate Cole

v. )

Continental Care Center, Inc. and )  
David Meisels )

NOTICE OF MOTION

To: LaKisha M. Kinsey-Sallis  
Dowd, Bloch & Bennett  
8 South Michigan Ave.  
19<sup>th</sup> Floor  
Chicago, Illinois 60603

Please take notice that on July 17, 2008, at 10:15 a.m., or as soon thereafter as counsel may be heard, we shall appear before the Honorable Judge James B. Zagel, or any judge sitting in his stead, in Courtroom 2503, at 219 S. Dearborn, Chicago, and then and there present the attached **MOTION FOR LEAVE TO FILE ANSWER AND AFFIRMATIVE DEFENSES.**

BY: /s/ Carey M. Stein

One of Defendant Meisels' Attorneys

Carey M. Stein  
ASHMAN & STEIN  
Attorneys for Defendants  
150 North Wacker Drive  
Suite 3000  
Chicago, Illinois 60606  
(312) 782-3484  
37710

**CERTIFICATE OF SERVICE**

The undersigned attorney certifies that a copy of the within notice and motion was served electronically through the Court's ECF filing system on:

**LaKisha M. Kinsey-Sallis  
Dowd, Bloch & Bennett  
8 South Michigan Ave.  
19<sup>th</sup> Floor  
Chicago, Illinois 60603**

/s/Carey M. Stein

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